

#### REMARKS

The claims have been amended to more clearly define the invention as disclosed in the written description. In particular, claim 5 has been cancelled, while the claims have been amended for clarity.

Applicant believes that the above changes answer the Examiner's 35 U.S.C. 112, paragraphs 1 and 2, rejections of claim 9, and respectfully request withdrawal thereof.

The Examiner has rejected claims 1-5, 8 and 13-15 (and apparently 17-19) under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent 5,886,732 to Humpleman in view of U.S. Patent 6,038,625 to Ogino, and further in view of U.S. Patent 6,826,699 to Sun. The Examiner has further rejected claim 9 under 35 U.S.C. 103(a) as being unpatentable over Sun in view of U.S. Patent 5,237,610 to Gammie et al. In addition, the Examiner has rejected claims 10 and 22 under 35 U.S.C. 103(a) as being unpatentable over Humpleman in view of Sun. Furthermore, the Examiner has rejected claims 11 and 12 under 35 U.S.C. 103(a) as being unpatentable over Humpleman in view of Ogino, and further in view of Sun, and further in view of U.S. Patent Application Publication No. 2001/0030959 to Ozawa et al. Finally, the Examiner has rejected claims 20 and 21 under 35 U.S.C. 103(a) as being unpatentable over Humpleman in view of Sun, and further in view of Ozawa et al.

The Humpleman patent discloses set-top electronics and network interface unit arrangement in which network interface units 32 perform selective decryption and distribute the decrypted signal

to the appropriate set-top box 40 for display on a television 12, or to a PC 20 for processing.

The Examiner has indicated that Humpleman discloses "a distributed digital television system comprising a plurality of discrete television sets", "decoding digital television signals for display at the respective television sets", and "a plurality of respective distributed signal decoding arrangement having respective cryptographic engines configured for executing conditional access".

Applicant submits, however, that Humpleman does not disclose or suggest "said plurality of discrete television sets comprising a plurality of respective signal decoding arrangements for decoding digital television signals for display at the television sets, said plurality of respective signal decoding arrangements having respective cryptographic engines configured for executing conditional access". Humpleman executes conditional access (col. 7, lines 49-50: "access control") not "at the television sets," but within the network interface module 50 of the network interface unit 32 (col. 7, lines 49-51: "network interface module 50"). Humpleman's signal decoding (i.e., MPEG decoder 70 and video decoder 72, col. 8, lines 17-25) occurs at the set-top electronics (FIG. 4, ref. no. 40) which are separated across a network 34 from the network interface unit 32 that performs conditional access (abstract, last sentence: "separate;" col. 2, line 7: "separate;" line 8: "separation;" col. 4, line 61: "separates;" line 66, "separation.") According to Humpleman, the

separation advantageously "reduces the need for duplication of the network interface functions at each television set . . . and thereby reduces the costs for the typical homeowner who will have more than one television set in the home" (see col. 2, lines 8-17; see also col. 5, lines 1-4: "This arrangement permits multiple set-top electronics to be distributed throughout the home 36 less expensively, since the electronics of a network interface unit do not have to be duplicated for each set-top electronics").

The Ogino patent discloses a method and system for providing a device identification mechanism within a consumer audio/video network in which several consumer electronics products "can be coupled to communicate together via a standard bus. This allows devices of the network to control one another and obtain information regarding one another."

The Examiner has indicated that while Humpleman does not expressly mention direct communication between televisions, Ogino teaches "a peer-to-peer network that comprises smart televisions that have the ability to transmit data with each other over an IEEE 1394 serial communications bus in order "to control one another and obtain information regarding one another" and enhance the coordination of audio/visual devices that are interconnected and share resources".

Applicant submits that the Examiner is reading more into Ogino than is disclosed therein. In particular, there is no disclosure of "smart televisions" in Ogino. Rather, Ogino lists a number of CE devices that are networked together to enable the

devices to control one another, where these CE devices may include television, VCR, tuner, set-top box (e.g., intelligent receiver/decoder, IRD), DVTRs, PCs, DVD players, etc. While it is known that several of these devices may control or be controlled by others of the devices, e.g., the tuner, set-top box, DVTR, DVD player and television may be controlled by the PC, there is no disclosure that the mere connection of a television to the network would enable the television to control another television on the network. Hence, without more, the mere connection of two televisions to the Ogino network does not disclose or suggest that the televisions are "smart televisions" and that there would be, or should be, direct communication between the television sets.

The Sun patent discloses a method and apparatus for performing authentication and key exchange protocols with multiple sink devices, in which various sink devices may initiate "a 5C Digital Transmission content Protection authentication and key exchange communication protocol with the source device 210".

Applicant submits, however, that Sun does not provide that which is missing from Humpleman and Ogino, i.e., "said plurality of discrete television sets comprising a plurality of respective signal decoding arrangements for decoding digital television signals for display at the television sets, said plurality of respective signal decoding arrangements having respective cryptographic engines configured for executing conditional access".

The Gammie et al. patent discloses an independent external security module for a digitally upgradeable television signal

decoder, in which a decoder 706 receives and demultiplexes the encrypted program and encrypted keys via demultiplexer 733.

The Examiner has indicated that Sun teaches "Means for inputting decoding authorization data so as to control, locally within the unit, decoding of a coded digital television signal received, said means being further configured for outputting decoding authorization data so as to remotely control decoding of a coded digital television signal received at another digital television".

Claim 9 currently states "means for inputting decoding authorization data so as to control, locally within the unit, the decoding of a coded digital television signal received, said means being further configured for outputting decoding authorization data to another digital television unit, said outputted decoding authorization data controlling decoding of a coded digital television signal received at said another digital television unit".

Applicant submits that while Sun discloses the transmission of an encryption key from the source device to various sink devices, there is no disclosure of a television unit having means for inputting decoding authorization data, and that the same means is configured to output decoding authorization data to another digital television unit.

The Ozawa et al. patent publication discloses data delivery in set-top box, in which a set-top box includes a smart card reader 140 for communicating with a smart card serving as a

Conditional Access Module (CAM). However, contrary to what is stated by the Examiner, Ozawa et al. neither discloses nor suggests any transferring of decryption key data from a smart card in a source device (signal decoding arrangement) to a smart card in a destination device (signal decoding arrangement).

In view of the above, Applicant believes that the subject invention, as claimed, is not rendered obvious by the prior art either individually or collectively (in any combination), and as such, is patentable thereover.

Applicant believes that this application, containing claims 1-4 and 8-22, is now in condition for allowance and such action is respectfully requested.

Respectfully submitted,

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